

1 Andrew H. Wilson
WILSON, RYAN & CAMPILONGO
2 115 Sansome Street
Fourth Floor
3 San Francisco, CA 94104
(415) 391-3900

4 Laurie J. Bartilson
5 MOXON & BARTILSON
6255 Sunset Blvd., Suite 2000
6 Hollywood, CA 90028
(213) 960-1936

7 Attorneys for Creditor
8 CHURCH OF SCIENTOLOGY INTERNATIONAL

9 UNITED STATES BANKRUPTCY COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 In re)	CASE NO. 95-10911 aj
)	
12 GERALD ARMSTRONG,)	Chapter 7
)	
13 Debtor)	Adv. No. 95-1164
)	
14)	PLAINTIFF'S ERRATA ON
)	CHURCH OF SCIENTOLOGY
15 CHURCH OF SCIENTOLOGY)	INTERNATIONAL'S MOTION
INTERNATIONAL, a California non-)	FOR PROTECTIVE ORDER
16 profit religious corporation,)	AND REQUEST FOR
)	SANCTIONS
17)	
Plaintiff,)	[F.R.C.P. 26, 37]
18)	
)	
19 v.)	
)	
20)	DATE: October 13, 1995
GERALD ARMSTRONG,)	TIME: 11:00 a.m.
21)	CTRM: Hon. Alan
)	Jaroslavsky
22 Defendant.)	
)	

23
24 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

25 Plaintiff Church of Scientology International submits the
26 following errata to its Memorandum of Points and Authorities in
27 Church of Scientology International's Motion for Protective Order
28 and Request for Sanctions [F.R.C.P. 26, 37], page 4:

1 F.R.C.P. 26(c).

2 Here, Armstrong has posed a document request seeking scores
3 of documents that have no possible relevance to the matters
4 addressed in the complaint: his bankruptcy petition. He seeks,
5 for example,

6 Each and every document provided or submitted by
7 you at any time to the Internal Revenue Service in
8 support of or concerning any and all applications for
9 or in pursuit of your tax exempt status, including,
10 but not limited to documents provided in or as part of
any judicial or administrative proceeding concerning
or relating to your application or applications for or
in pursuit of your tax exempt status.

11 [Ex. A, #37] After the longest and most extensive investigation
12 of any religious group in United States history, the IRS granted
13 the Church of Scientology International and related Scientology
14 churches tax exempt status in October, 1993. The submissions to
15 the IRS by the Church would probably fill several rooms. They
16 have absolutely no bearing on this litigation.

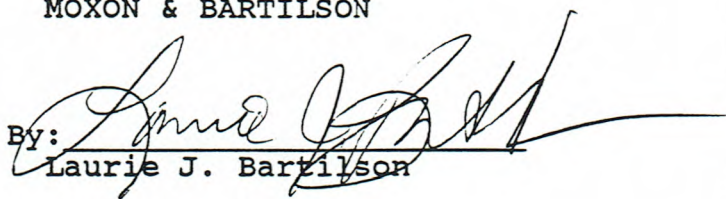
17 Requests like this fill Armstrong's 37 pages. See, e.g.,
18 Request No. 5 (Minutes of Board meetings of any Scientology
19 Church, from any year, which mention any of 12 persons, none of
20 whom is Armstrong); No. 9 (All documents which Armstrong's
21 lawyers were required by the terms of the 1986 settlement to
22 return to the Church); No. 13 (All documents demonstrating legal
23 or investigative fees paid by the Church since 1981); Nos. 43,
24 44, 45, 46, 47, 48, 49, 50 (All documents which relate to or
25 mention Armstrong's former attorneys, and/or attorneys who never
26 represented Armstrong, but represented other parties in cases
27 against Church entities, again involving perhaps entire rooms of
28 litigation files, many of which are either privileged or under

1 Dated: September 22, 1995

Respectfully submitted,

2 MOXON & BARTILSON

3
4 By:


Laurie J. Bartilson

5
6 Andrew H. Wilson
WILSON, RYAN & CAMPILONGO

7 Attorneys for Creditor
8 CHURCH OF SCIENTOLOGY INTERNATIONAL
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

2
3

4
5
6
7

8
9
0
1
2
3
4

5
6

7
8
9

0

1
2

3
4
5
6
7
8

1 Executed on September 22, 1995, at Los Angeles,
2 California.

3 [] **(BY PERSONAL SERVICE) I delivered such
4 envelopes by hand to the offices of the
addressees.

5 Executed on _____, at Los Angeles, California.

6 [X] (State) I declare under penalty of the laws
7 of the State of California that the above is true
and correct.

8 [] (Federal) I declare that I am employed in the
9 office of a member of the bar of this court at
whose direction the service was made.

10 Abel E. Hernandez
11 Print or Type Name

Abel E. Hernandez
Signature

12 * (By Mail, signature must be of person depositing
13 envelope in mail slot, box or bag)

14 ** (For personal service signature, must be that of
15 messenger)

16
17
18
19
20
21
22
23
24
25
26
27
28